

June 19, 2011

C. Wayne Ives
NH DES
29 Hazen Drive
Concord, NH 03302

Subject: comments on the Draft -Lamprey River Water Management Plan
(hereinafter, "THE PLAN")

Dear Mr. Ives,

As you can see from the many comments that you have received from Pawtuckaway Lake residents, "THE PLAN" has raised many serious concerns and appears flawed in many respects.

Some of the concerns that residence have expressed to me:

1. The drawdown numbers presented are theoretical. They have not been actually tested or measured by experiment. There is no evidence that the plan would even work, ESPECIALLY in time of DROUGHT. Simply stated, there is hypothetical statistical projection, but there is NO SCIENCE.
2. There should be a downside limit to the removal of waters in the Spring, Summer, Fall. For example, if the lake measure is full to minus 12 inches, perhaps 5 inches (as projected in the report) could be supplied downstream. However, if the lake level is already decreased by more than a certain measure – as in -12 inches in the above example, the drawdown will cease.
3. Water impoundment in the winter? It appears that the report has changed it mind on this, even in the last 90 days. In "THE PLAN", the lake drawdown in Winter has decreased from a 5 foot drawdown to a 4.7 foot drawdown, as presented on June 11, 2011, This has happened during the public comment period. How can "THE PLAN" keep changing

4. One main feature of the Plan centers on Winter impoundment of water for emergency purposes. Meanwhile, there are DES and Coastal Management plans to remove dams on the Lamprey! How does this fit the impoundment strategy? Recently, the dam on the Lamprey at Rt. 27 in Epping (Bunker Dam) has been released. Page 1 of a DES archaeological report says, "Removal of the dam will eliminate the pond upstream and may lower water levels in the area by as much as nine feet (Finemore 2009:2)." WHERE IS THIS STRATEGY IN THE INFLOW PLAN? So how does removing it affect all the flow calculations in the DES plan? There are inherent conflicts in planning even at the NH DES.
5. "THE PLAN" looks like a cover to supply Durham and the State University with water. The University has grown to over 15,000 who use facilities. YET, THEY DON'T HAVE A PRIVATE WATER SUPPLY! They have an aquifer that is recharged from the LAMPREY RIVER !

At a recent meeting , I was told "oh, they are planning on drilling a well." When? How much water is projected from it? Why not drill the wells, supply the water needed via the wells, and shelve this plan until there is truly an emergency.

The fact is, in the event of a true emergency, the NH DES can lower all the lakes that feed the lamprey and take as much water as they deem necessary. The State controls the flowage rights.

Therefore, if we are going to make a plan such as, "THE PLAN", let's think it through, test it for soundness, and then proceed.

I recommend that you do not implement the Lamprey River Water Management Plan as written.

Sincerely,



Tom Duffy, President ,
Pawtuckaway Lake Improvement Association
PO BOX 30
Raymond, NH 03077

Lake Residence: 23 Jampsa Trail, Nottingham, NH 03290